

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case:4:22-cr-20194  
Judge: Kumar, Shalina D.  
MJ: Ivy, Curtis  
Filed: 04-06-2022 At 11:03 AM  
INDI USA v BROWN (sk)

TAKAIS ARMON BROWN,

Defendant.

Violation:  
18 U.S.C. § 922(g)(1)

/

**INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**Felon in Possession of a Firearm  
18 U.S.C. § 922(g)(1)**

On or about July 21, 2021, in the Eastern District of Michigan, Takais Armon Brown, knowing he had been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, one Pioneer Arms Corp. Model HELLPUP semi-automatic pistol, caliber 7.62 x 39mm, in violation of Title 18, United States Code, Section 922(g)(1).

**FORFEITURE ALLEGATION**  
**18 U.S.C. § 924(d) and 28 U.S.C. § 2461**

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c). Upon conviction of any offense in violation of 18 U.S.C. § 922(g), the defendant shall forfeit to the United States any firearm or ammunition involved in or used in any knowing violation of section 922(g), including but not limited to: one Pioneer Arms Corp. Model HELLPUP semi-automatic pistol, caliber 7.62 x 39mm, bearing serial number PAC1152003.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson  
Grand Jury Foreperson

DAWN N. ISON  
United States Attorney

s/William J. Vailliencourt, Jr.  
William J. Vailliencourt, Jr. (P39115)  
Assistant United States Attorney  
101 First Street, Suite 200  
Bay City, MI 48708  
(989) 895-5712  
William.vailliencourt@usdoj.gov

s/Anthony P. Vance  
Anthony P. Vance  
Assistant United States Attorney  
Chief, Branch Offices

Dated: April 6, 2022

**Companion Case information MUST be completed by AI**

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>		<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :		<b>Judge Assigned:</b>
<input type="checkbox"/> Yes	X No	<b>AUSA's Initials:</b> WJV

**Case Title:** USA v. Takais Armon Brown

**County where offense occurred:** Genesee County

**Check One:** X Felony     Misdemeanor     Petty

Indictment/\_\_\_\_\_ Information --- **no** prior complaint.  
 Indictment/\_\_\_\_\_ Information --- based upon prior complaint [Case number:]  
 Indictment/\_\_\_\_\_ Information --- based upon LCrR 57.10 (d) [*Complete Superseding section below*].

**Superseding Case Information**

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<b>Defendant name</b>	<b>Charges</b>	<b>Prior Complaint (if applicable)</b>
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**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

Date: April 6, 2022

s/*William J. Vailliencourt, Jr.*  
 William J. Vailliencourt, Jr.  
 Assistant United States Attorney  
 101 First Street, Suite 200, Bay City, MI 48708  
 Phone: 989-895-5712  
 Fax: 989-895-5790  
 E-Mail address: [William.vailliencourt@usdoj.gov](mailto:William.vailliencourt@usdoj.gov)  
 Attorney Bar #: P-39115

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.